



January 11, 2023

**BY ECF**

The Honorable Gabriel W. Gorenstein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*Re: In re: New York City Policing During Summer 2020 Demonstrations, No. 20-CV-8924*  
*This Filing is Related to All Cases*

Dear Judge Gorenstein:

We write on behalf of the non-stayed Plaintiffs pursuant to your order dated January 9, 2023 (Dkt. No. 807), concerning Plaintiffs' letters in Dkt. Nos. 774 and 806 and appreciate the opportunity to provide additional clarification. Plaintiffs confirm that we wish to have the dispute regarding Defendants' privilege assertions resolved based on the letters submitted and do not seek formal briefing. In accordance with your order, we selected a sample of documents to be sent to the Court for potential in camera review and transmitted that list to Defendants today.<sup>1</sup>

Respectfully submitted,

By: /s/ Daniel Lambright  
Daniel R. Lambright  
Molly K. Biklen  
Jessica Perry  
Robert H. Hodgson  
Veronica Salama  
Lisa Laplace  
Christopher T. Dunn  
**New York Civil Liberties Union  
Foundation**  
125 Broad Street, 19<sup>th</sup> Floor  
New York, NY 10004  
(212) 607-3300  
[dlambright@nyclu.org](mailto:dlambright@nyclu.org)

By: /s/ Corey Stoughton  
Corey Stoughton  
Jennvine Wong  
Rigodis Appling  
**The Legal Aid Society**  
199 Water Street  
New York, NY 10038  
(212) 577-3367  
[cstoughton@legal-aid.org](mailto:cstoughton@legal-aid.org)

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<sup>1</sup> This sample does not include examples of the "DHS Reports," given that Defendants' cite only the need for federal authorization to produce these documents, in an apparent withdrawal of any independent privilege assertions over them, as discussed in our Letter in Dkt. No. 806.